

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

MUTINTA MICHELO, <i>et al.</i> ,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	
	)	18 Civ. 1781 (PGG)
NATIONAL COLLEGIATE STUDENT	)	consolidated with
LOAN TRUST 2007-2, <i>et al.</i> ,	)	18 Civ. 7692 (PGG)
	)	
Defendants.	)	

**TRANSWORLD SYSTEMS INC.’S  
MOTION TO STAY ENFORCEMENT OF APRIL 23 ORDER**

NOW COMES Transworld Systems Inc. (“TSI”), through undersigned counsel, and respectfully files its Motion to Stay Enforcement of this Court’s Order entered on April 23, 2021 (the “Order”) (Dkt. 280 in Case No. 18-CV-1781). That Order granted in part plaintiff’s motion for sanctions against TSI (the “Motion”), and imposes substantial relief against TSI.

Contemporaneously with the filing of this motion, TSI has filed an objection to the Order.<sup>1</sup>

To be clear, TSI does not in any way oppose the deposition of Affiant X proceeding as scheduled, or the completion of discovery as scheduled. TSI simply seeks a stay of enforcement of the Order to the extent that it imposes any sanctions against TSI, monetarily or otherwise, until TSI’s objection to the Order is resolved.

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<sup>1</sup> TSI incorporates its response to the plaintiffs’ Motion (Dkt. 274 in Case No. 18-CV-1781) and its objection to the Order, by reference.

WHEREFORE, Transworld Systems Inc., respectfully requests that this Court stay enforcement of the Order until the District Court resolves TSI's pending objection to the Order, and for all other and further relief that this Court deems just and appropriate.

Respectfully submitted,

/s/ James K. Schultz

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**CERTIFICATE OF SERVICE**

I hereby certify that on May 7, 2021 a true and correct copy of the foregoing was served upon counsel of record via ECF.

/s/ James K. Schultz